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LAW OFFICES
Messer, Caparello & Self
A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

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September 13, 2002

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 020738-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC are the following documents:

1. An original and fifteen copies of AT&T's Motion for Leave to File Amended Petition; and *09782-02*
2. An original and fifteen copies of AT&T's Amended Petition Requesting Suspension of and Cancellation of General Intrastate Access Tariff Filed by BellSouth Telecommunications, Inc. *09783-02*

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

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M. Hancock
FPSC-BUREAU OF RECORDS

Sincerely yours,

Tracy W. Hatch
Tracy W. Hatch

TWH/amb
Enclosures

cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of AT&T Communications)	Docket No. 020738-TP
Of the Southern States, LLC for suspension)	
and cancellation of Switched Access)	
Contract Tariff No. FL2002-02 filed by)	Filed: September 13, 2002
BellSouth Telecommunications, Inc.)	
_____)	

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MOTION FOR LEAVE TO FILE AMENDED PETITION

AT&T Communications of the Southern States, LLC ("AT&T"), in accordance with Rule 28-106.202, Florida Administrative Code, hereby requests that the Florida Public Service Commission ("Commission") grant leave to AT&T to amend its initial Petition in this docket. In support, AT&T states:

1. On July 16, 2002, AT&T filed its initial Petition asking the Commission to suspend and cancel the Switched Access Contract Tariff No. FL2002-02 filed by Bellsouth Telecommunications, Inc. ("BellSouth").

2. On August 12, 2002, BellSouth filed its Answer to AT&T's Petition. In its Answer, BellSouth stated that its initial contract tariff memorialized an agreement with Sprint. BellSouth further stated that, to make its discount switched access tariff provisions generally available to every IXC, BellSouth was amending its intrastate Switched Access Services Tariff to include Section E27. A copy of Section E27 was attached as an exhibit to BellSouth's Answer.

3. The amendment to BellSouth's Switched Access Services Tariff containing Section E27 was filed August 12, 2002. The provisions of Section E27 are virtually identical to the provisions of the Switched Access Contract Tariff embodied in Section E26 of BellSouth's intrastate Switched Access Services Tariff that is the subject

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of AT&T's initial Petition. As a result, Section E27 suffers from the same flaws as Section E26.

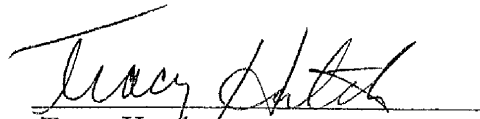
4. In order to achieve a more timely and efficient resolution of the issues regarding the anticompetitive and discriminatory effects of both Sections E26 and E27 of BellSouth's switched access discount plans, AT&T requests that the Commission grant AT&T leave to file an amended Petition in this proceeding to include BellSouth's switched access tariff, Section E27 in this proceeding. AT&T's Amended Petition is filed concurrent with this Motion.

6. No party will be prejudiced by the filing of and amended petition at this early stage of the proceeding. Further, the Commission and the parties would benefit from a more efficient and comprehensive examination of both Sections E26 and E27 of BellSouth's intrastate Switched Access Services Tariff in a single proceeding.

7. AT&T has consulted with Counsel for BellSouth to ascertain BellSouth's position as to AT&T's request to submit an amended petition. BellSouth informed AT&T that it does not object to AT&T's request for leave to amend its petition.

WHEREFORE, for the foregoing reasons, AT&T respectfully requests that the Commission grant leave to file its Amended Petition.

RESPECTFULLY SUBMITTED this 13th day of September, 2002.



Tracy Hatch

Messer, Caparello & Self
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
(850) 222-0720

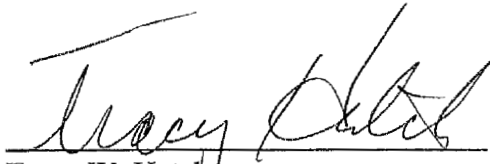
Attorney for AT&T Communications of the
Southern States, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery this 13th day of September, 2002.

Lee Fordham, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301


Tracy W. Hatch